

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 11-20129

-vs-

Hon. Robert H. Cleland

D-20, TONY WAYNE KITCHENS, et al.

Defendants.

MOTION TO MODIFY ORDER SETTING CONDITIONS
OF RELEASE REGARDING TRAVEL TO ALLOW
DEFENDANT TONY WAYNE KITCHENSTO TRAVEL TO AKRON, OHIO

NOW COMES the Defendant, Tony Wayne Kitchens (D-20) by and through his Panel Attorney Thomas W. Jakuc, and request that this Honorable Court modify previously entered Order Setting Conditions of Bond Release [Doc. 383] for the following reasons:

1. That Defendant, Tony Wayne Kitchens is charged with the following count: Count 33: Perjury, 18 U.S.C. § 1623.

2. That Defendant, Tony Wayne Kitchens was brought before this Court at which time he was released on bond [Doc. 383] subject as follows:

“Travel restricted to: Northern District of Alabama and the Eastern District of Michigan for court appearances.”

3. Defendant, Tony Wayne Kitchens has a son, Eric Andrew Francis, whom he hasn't seen for a significant amount of time, who is in his 30's as well as a granddaughter, who live in Akron, Ohio.

4. That Defendant, Tony Wayne Kitchens has complied and met with all conditions of bond release as previously set forth in Docket #383.

5. That Defendant, Tony Wayne Kitchens wishes to visit with his son in Akron, Ohio for a period of seven days within the time of April 1, 2014 through April 15, 2014.

That Probation Officer Mark Stewart has been notified in this regard, and has no objections to the change in conditions of bond.

Also AUSA Saima Mohsin has been emailed this Motion on February 21, 2014 and has indicated she has no objection to this Motion.

WHEREFORE, Defendant, Tony Wayne Kitchens requests that this Honorable Court modify previously entered Order Setting Conditions of Release as to Tony Wayne Kitchens to allow him to travel to Akron, Ohio as aforesated and to return to his residence in Albertville, Alabama.

Respectfully submitted,

THOMAS LEGAL CENTERS, P.C.

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P15426

DATED: February 24, 2014

CERTIFICATE OF MAILING

I certified that a copy of Motion to Modify Order Setting Conditions of Release Regarding Travel to Allow Defendant to Travel to Akron, Ohio this Certificate of Mailing was mailed to all attorneys of record on this date of February 24, 2014 by electronic and/or ordinary mail.

Date: February 24, 2014

s/Joyce J. Crechiolo
Secretary to Thomas W. Jakuc
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